

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRANDON SMIETANA and)
SKYCOIN GLOBAL FOUNDATION LIMITED,)
a Singapore company, and SYMBOLIC)
ANALYTICS INC. a Delaware Corporation)

Plaintiffs,

v.

BRADFORD STEPHENS,)
AARON KUNSTMAN,)
HARRISON GEVIRTZ, f/k/a “HaRRo”,)
RYAN EAGLE, ADAM YOUNG,)
FAR AHEAD MARKETING, LLC.,)
JOEL WAYNE CUTHRIELL f/k/a “JOEL”,)
MORGEN PECK, TRISTAN GREENE,)
BRYAN CLARK, CATHERINE BYERLY,)
STEVEN LEONARD, JOSHUA OGLE,)
CONDÉ NAST d/b/a THE NEW YORKER,)
THE NEW YORKER, and)
UNKNOWN INDIVIDUALS AND COMPANIES)

Defendants.

Case No. 1:22-cv-00708

Honorable Sara L. Ellis

JURY DEMANDED

**PLAINTIFFS’ FOR EXTENSION OF TIME TO FILE A SECOND AMENDED
COMPLAINT**

NOW COME Plaintiffs, BRANDON SMIETANA (“Smietana”), SKYCOIN GLOBAL FOUNDATION LIMITED, a Singapore Company, and SYMBOLIC ANALYTICS, INC., a Delaware Corporation (“SA”), by and through their attorneys, The Law Office of Michael C. Goode, for their Complaint against Defendants, Bradford Stephens, Aaron Kunstman, Harrison Gevirtz f/k/a “HaRRo”, Ryan Eagle, Adam Young, Far Ahead Marketing, LLC., Joel Wayne Cuthriell f/k/a “JOEL”, f/k/a “Caribou”, Morgen Peck, Tristan Greene, Bryan Clark, Catherine

Byerly, Steven Leonard, Joshua Ogle, Condé Nast d/b/a The New Yorker, The New Yorker, and *UNKNOWN INDIVIDUALS AND COMPANIES*, states as follows:

1. This Honorable Court issued an Order on July 14, 2022 allowing Plaintiffs leave until August 31, 2022 to file their Amended Complaint at Law.
2. While drafting Plaintiffs' Amended Complaint at Law, counsel for Plaintiffs discovered that the Statute of Limitations for an article involving the defamation of Plaintiffs was up on August 18, 2022.
3. Plaintiffs submitted an Amended Complaint at Law on August 18, 2022 to preserve the Statute of Limitations date, however did not fully complete all additions and changes for the rest of the Amended Complaint.
4. Time constrictions between Plaintiffs' counsel in the United States and Plaintiffs, who reside in China, have caused delays in communications affecting the ability to file the Second Amended Complaint by the Court's original Order date of August 31, 2022.
5. Plaintiffs request an extension of time and leave of Court to file their Second Amended Complaint at Law by September 20, 2022, which will include all intended additions and changes.
6. Plaintiffs' counsel has discussed the above with the attorneys of record for Defendants, who do not object to the request for the extension to file the Second Amended Complaint by September 20, 2022.

7. Given this Honorable Court grants this Motion, Plaintiffs additionally ask to provide Defendantats with an extension of 28 days to answer or otherwise respond to Plaintiffs' Second Amended Complaint by October 18, 2022, to accomodate the new filing date of September 20, 2022.

WHEREFORE, Plaintiffs pray that this Honorable Court enter an order allowing Plaintiffs to submit a Second Amended Complaint at Law by September 20, 2022.

DATED: August 18, 2022

Respectfully submitted,

/s/ Michael C. Goode
Michael C. Goode

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